

WISCONSIN
NRCS Civil Rights Performance Plan and Accomplishments Report
Fiscal Year 2007

GOAL: 1. Commitment of Agency Leadership/Strategic Plan Integration:

Incorporated the Department of Agriculture (USDA) Civil Rights policy and other related requirements through agency/staff office operations to ensure that customers and employees are treated in accordance with anti-discrimination laws and regulations.

PERFORMANCE OBJECTIVE: 1.1 Leadership:

Held managers, supervisors, and other employees accountable for ensuring that USDA's customers and employees were treated in accordance with USDA Civil Rights policy and applicable legal requirements.

GOAL INDICATOR: 1.1 (a) Inclusion in Strategic Plan:

Documented commitment to USDA's Civil Rights goals and obligations in the Agency's Strategic Plan. Agencies must have incorporated the requirements of Departmental Regulation (DR) 4300-010 "Civil Rights Accountability Policy and Procedures," issued January 18, 2007. Additionally, agencies were required to notify all employees of the requirements of this policy, and managers and supervisors were responsible and accountable for maintaining a Civil Rights program that accomplishes the strategic Civil Rights goals. Agencies are required to submit portions of the Strategic Plan that reflect Civil Rights goals and to provide a succinct narrative rationale with evidence as to how the Agency determined its self-assessed point value.

SCORING: Total: 3 Points

- 3 Points:** Included Civil Rights goals and obligations in the Strategic Plan and 50-100 percent of goals were met.
- 2 Points:** Included Civil Rights goals and obligations in the Strategic Plan and 0-49 percent of goals were met.
- 1 Point:** Developed a plan to include Civil Rights goals and obligations into the Strategic Plan.
- 0 Points:** Took no action to include Civil Rights goals and obligations into the Strategic Plan.

AGENCY RESPONSE:

Civil Rights policy and leadership support is documented in all business plans in Wisconsin. Significant Civil Rights and Outreach Actions from the Wisconsin NRCS FY 2007 Business Plan:

- *Coordinate state outreach and support Field and SEPMs in outreach to potential customers.*
- *Complete CR Complaint training to all Employees.*

- *Developed and Implemented the new Student Recruitment Plan.*
- *Implement Civil Rights Long Range and Annual Plans, which includes SEPM individual plans.*
- *Implement Quality Assurance Plan including status reviews, program reviews, field office reviews, civil rights reviews and O&E reviews.*
- *Initiate efforts with NASS for high quality farmer demographic data and outreach efforts.*
- *Create and provide CR F.O Folder Guidance.*
- *Support Env. Res Center research on outreach to Hispanic farmers in WI.*
- *Continue to support WI Tribal Conservation Advisory Council.*

There are several additional items in the Civil Rights Committee's Business Plan to promote hiring and outreach goals including:

- *Actively support and participate in the Minorities in Agriculture, Natural Resources and Related Sciences (MANRRS) Chapters meetings at University of Wisconsin- Madison and network with other universities. Assisted in the planning process of the MANRRS Region V Workshop on Nov. 11, 2006, participated in Mock Interviewing Process workshop and held NRCS booth display.*
- *Participated in the Annual Hmong Wisconsin Conference hosted by the Wisconsin United Coalition of Mutual Assistance Associations, Inc. in presenting Web Soil Survey booth demonstration, handouts of NRCS brochures and translation materials.*
- *Update Civil Right page on WI NRCS Website and create diversity maps of WI farmers from NASS data.*
- *Create booklet for interns and supervisors to inform them of pertinent information to arrival of students.*
- *Research and explore possible issues/barrier for individuals not receiving or meeting certification requirements.*
- *Provide general support for summer student at annual event at end of the summer work experience.*
- *Continue to promote the Mentoring Program and provide all NRCS employees with the opportunity to receive guidance from their mentors.*

GOAL INDICATOR: 1.1 (b) Employee's Performance Plan:

Incorporated the requirements of DR 4300-010, "Civil Rights Accountability Policy and Procedures," issued January 18, 2007. DR-4300-010 requires that annual performance appraisals for managers and supervisors shall include an evaluation of their contributions to USDA's commitment to Civil Rights and equal opportunity, and adherence to its Civil Rights policy. In addition, agencies are required to send a copy of a representative sampling of performance plans showing evidence of equal employment opportunity (EEO) elements for SES, GS-15, GS-14, GS-13, GS-12, GS-9-11, and GS-1-8. Agencies must provide a succinct narrative rationale with evidence as to how the Agency determined its self-assessed point value.

SCORING: Total: 5 Points

5 Points: 100 percent of all performance plans conform to this indicator.

4 Points: 80-99 percent of all performance plans conform to this indicator.

3 Points: 60-79 percent of all performance plans conform to this indicator.

2 Points: 36-59 percent of all performance plans conform to this indicator.

1 Point: 21-35 percent of all performance plans conform to this indicator.

0 Points: No performance plans conform to this indicator.

AGENCY RESPONSE:

Mandatory Equal Opportunity and Civil Rights Performance elements are in all Wisconsin NRCS employee's standards of performance.

Civil Rights responsibilities are included in all NRCS supervisor's job descriptions.

Narrative plan of operation in all NRCS WI Service Centers include measurable civil rights objectives, goals and action items.

In fiscal year 2007 we have not encountered any Civil Rights issues of discrimination or misconduct. Increased and more effective delivery or program benefits continue to be of the highest priority to Native American and Hmong Communities. Outreach activities are more fully documented under Goal Indicator 2. (b).

The Wisconsin Civil Rights Committee is fully staffed with all SEPM positions filled and inclusion of a Mentoring Coordinator, Area representatives as needed for field operations communication with all employees. In addition, the WI CR Committee has the full participation from the State Conservationist, State Outreach Coordinator and Human Resource Manager, and the entire State Management Team. Regular Civil Rights Reports are made to the Management Team to complete the communication loop.

GOAL INDICATOR: 1.1 (c) Disciplinary Actions:

To ensure accountability, disciplinary, or corrective actions were taken when discriminatory conduct relating to Civil Rights violations or retaliation occurred. Agencies are required to provide the number of employee cases where disciplinary or corrective action was taken relating to Civil Rights or retaliation and indicate the timeframe in which the disciplinary or corrective action was taken. Agencies incorporated the provisions of DR 4300-010 "Civil Rights Accountability Policy and Procedures," issued January 18, 2007. Agencies must provide a succinct narrative rationale with evidence as to how the Agency determined its self-assessed point value.

SCORING: Total: 5 Points

5 Points: 90-100 percent of disciplinary or corrective actions initiated and/or completed within 30 days of Agency being notified this fiscal year (FY).

4 Points: 80-89 percent of disciplinary or corrective actions initiated and/or completed within 60 days of Agency being notified this FY.

3 Points: 70-79 percent of disciplinary or corrective actions initiated and/or completed within 90 days of Agency being notified this FY.

2 Points: 60-69 percent of disciplinary or corrective actions initiated and/or completed within 120 days of Agency being notified this FY.

1 Point: 50-59 percent of disciplinary or corrective actions initiated and/or completed within 150 days of Agency being notified this FY.

0 Points: 49 percent or less of disciplinary or corrective actions initiated and/or completed within 180 days of Agency being notified this FY.

AGENCY RESPONSE:

No disciplinary or corrective action needed in Wisconsin this Fiscal Year.

GOAL INDICATOR: 1.1 (d) Civil Rights Impact Analyses:

Conducted effective Civil Rights Impact Analyses (CRIA). Agencies are required to provide the number of CRIAs submitted to the Office of the Assistant Secretary for Civil Rights (ASCR).

Agencies must provide a succinct narrative rationale with evidence as to how the Agency determined self-assessed point value.

SCORING: Total: 3 Points

3 Points: Agency collaborated in advance with ASCR on complex and challenging CRIAs. Submitted timely, 90-100 percent of CRIAs and documentation were comprehensive and complete. All CRIAs were thorough and ASCR did not request additional materials from the Agency.

2 Points: CRIAs were comprehensive and complete with only minor requests for information needed. CRIAs were submitted timely 70-89 percent of the time. Additional requested information was submitted to ASCR on a timely basis and analysis completed.

1 Point: CRIAs were conducted and forwarded to ASCR; however, ASCR determined that not enough relevant information or analysis was provided in 50-69 percent of the regulations submitted or extensive guidance and technical support was needed and provided. Additional requested information was submitted to ASCR on a timely basis and analysis was completed.

0 Points: CRIAs were conducted and forwarded to ASCR; however, ASCR determined that not enough relevant information or analysis was provided in 0-49 percent of those submitted or extensive guidance and technical support was needed and provided. Additional requested information was submitted to ASCR on a timely basis, and analysis completed.

AGENCY RESPONSE:

No disciplinary or corrective action needed in Wisconsin this Fiscal Year.

GOAL: 2. Program Delivery: Proactive Management and Legal Compliance:

Ensured all customers equal opportunity to access programs, activities, and services delivered or funded by USDA.

PERFORMANCE OBJECTIVE: 2.1 Program Delivery/Legal Compliance:

Delivered Agency programs in compliance with Civil Rights laws, Departmental regulations, policy, and goals.

GOAL INDICATOR: 2.1 (a) Collection and Analysis of Program Applicant/Participant Data:

Reviewed and incorporated Civil Rights program analysis by collecting and analyzing data on applicants and participants by race, ethnicity, sex, national origin, disability, and age (RESNODA)* status. Agencies are required to provide evidence for each program that it collects and provides analyses of applicant and participant data by RESNODA.

RESNODA is required by the Farm Security and Rural Investment Act of 2002. “*Transparency and Accountability for Socially Disadvantaged Farmers and Ranchers; Public Disclosure Requirements for County Committee Elections*, Section 10708, Public Law 107-171 (7U.S.C. 7901). In this law, Congress requires an annual report of the participation rate of socially disadvantaged farmers and ranchers - as a percentage of all farmers and ranchers—for each USDA program established for farmers and ranchers according to race, ethnicity, gender, county and State.

For agencies that currently collect data, please indicate the total number of programs administered, and the number of programs where data are collected.

For agencies that currently do not collect applicant and/or participant data by RESNODA, please state the reasons why.

Agencies are required to provide a succinct written rationale with evidence as to how the Agency determined its self-assessed point value.

* Please note that these bases for collection of data are different than those used by the Equal Employment Opportunity Commission (EEOC) for employment purposes.

SCORING: Total: 2 Points

2 Points: Established data collection standards, and analyzed RESNODA data of applicants and participants for 70-100 percent of Agency programs where data was collected, and made recommendations for improvement in program delivery.

1 Point: Established data collection standards and analyzed RESNODA data of applicants and participants for 50-69 percent of Agency programs where data was collected, and made recommendations for improvement in program delivery.

0 Points: Established data collection standards, and analyzed RESNODA data of applicants and participants for 40 percent or less of Agency programs where data were collected, and made recommendations for improvement in program delivery.

AGENCY RESPONSE:

Participant data is collected by RESNODA. This is quality reviewed at all levels of program delivery. Participation data in PRS does reflect that minorities and women are participating in programs. Race, sex and national origin data collected does reflect parity in program participation. Parity in program participation is reviewed at every field office appraisal on regularly scheduled times and when specific needs are identified.

There are no Civil Rights Program Complaints for Wisconsin NRCS as of this report.

Strong relationships are maintained and fostered with historically underserved populations in Wisconsin through advisory groups and designated collateral duties and dedicated positions such as Tribal Liaisons to ensure mutual understanding.

GOAL INDICATOR: 2.1 (b) Increased Service Delivery Goals, Removed Barriers, and Increased Program Delivery: Created or enhanced program service delivery by: (a) Taking affirmative steps to remove barriers to ensure equal opportunity to participation, (b) Increasing service delivery goals, and (c) Increasing diversity on program committees and boards. Agencies are required to provide evidence of how they met each of these requirements. Agencies must provide a succinct written rationale with evidence as to how the Agency determined its self-assessed point value.

SCORING: Total: 3 Points

3 Points: Complied with all 3 requirements listed below:

- (a) Took affirmative steps to remove barriers for groups with low participation;
- (b) Established goals to increase service delivery; and
- (c) Provided: (1) the number of boards/commissions that expired in FY 2007, (2) The number of boards/commissions that were re-established, and

(3) demographic data for each expired and new board/commission to demonstrate the increase in diversity on the boards/commissions.

2 Points: Complied with 2 of the 3 requirements listed above in “3 Points.”

1 Point: Complied with 1 of the 3 requirements listed above in “3 Points.”

0 Points: Complied with 0 of the 3 requirements listed above in “3 Points.”

AGENCY RESPONSE:

The State Outreach Committee’s Reports for the Third and Fourth Quarters combined are below. The 1st & 2nd Quarter will be reported in the 2008 State Performance Plan. The above goal indicator is addressed with specific accomplishments by group:

State Level Activities

LULAC - The League of United Latin American Citizens (LULAC), the oldest and largest Latino civil rights organization in the United States, held its national conference in Milwaukee, Wisconsin June 26th through July 1, 2006. An estimated 15,000 political, community and business leaders attended to discuss Latino issues. Wisconsin NRCS supported the NRCS national office with staffing at the NRCS exhibit for the LULAC Expo, and provided information materials and promotional items for distribution. Wisconsin NRCS Special Emphasis Program Managers participated in SEPM training offered at the conference.

Hmong Assistance – Wisconsin NRCS provided an updated brochure in both English and Hmong language to the 11 Hmong Mutual Associations in Wisconsin. The brochure describes NRCS conservation technical assistance and the farm bill conservation programs. Wisconsin has one of the highest populations of Hmong, an agrarian culture from SE Asia, in the US. NRCS has also provided additional copies of the Pesticide Applicators training handbook and video to the Hmong associations.

Disabled Farmers – NRCS serves as an advisor to the Wisconsin Agrability Council, a program through Easter Seals and the University of Wisconsin Cooperative Extension to help disabled farmers continue farming. Wisconsin Agrability was recognized with a national award for service April 26 with many of its past clients in attendance.. NRCS Field Offices in Wisconsin have been provided information on Agrability, to serve as a referral to farmers who are disabled through traumatic injury or chronic illness.

Hispanic Farmers – Wisconsin HEPM contacted and met with Univision Milwaukee to learn more about how we can work together to promote conservation with the Hispanic communities.

Field Office Activities

La Crosse.....District Conservationist met with approximately 20 local Hmong individuals to present a discussion on land use decisions to consider when purchasing farmland. There is

considerable local interest among the group to begin purchasing farmland to raise market vegetable and small livestock operations.

Waukesha DC and SC assisted the national NRCS HEPM with setup, staffing and take down of the NRCS booth at the League of United Latin American Citizens (LULAC) National Conference held in Milwaukee, WI, June 27 -30. The booth was for a three-day Expo at the convention, with over 200 corporations, government agencies, employers, colleges, and non-profit organizations participating. The convention was attended by more than 15,000 individuals, mostly Hispanics. Approximately 500 (including more than 100 students) visited the NRCS booth which contained program and career information.

Wood..... NRCS display at the Earth Day Prairie Chicken Festival, 150 people attending. Brief technical assistance on NRCS and NRCS programs to 2 female landowners, 1 Amish landowner, and 1 Hispanic landowner. Provided NRCS career information to 4 MSTC/UWSP female students. Provided brief technical assistance to 1 Amish landowner on grazing programs. Provided brief technical assistance to one Native American landowner on NRCS programs. Provided brief technical assistance to one Indian landowner on NRCS and what we do.

Winnebago..... 8 hours technical assistance for Community Gardens in Oshkosh. The gardeners are mainly elderly, disabled, and Hmong residents.

Marquette..... taught portion of UWSP wetland ecology class to 15 students; including minorities and females; and taught 50 Montello 6th graders a short soils field course; students included minorities and females

Ladysmith.....display at the 4-day Rusk County fair in outreach effort to reach underserved groups and increase participation in programs such as EQIP and WRP.

Sheboygan..... Farm Technology Days numerous NRCS exhibits with interest and attendance from a diverse audience from nearby urban areas. 100,000 total attendance.

Richlandtwo multiflora rose workshops with limited resource producers attending; Backyard conservation workshop, and two meetings in Muscoda, Richland Center with Ho Chunk concerning burial mound protection

Marathon..... CSP: two contracts with female producers, one contract with a disabled producer. Three women landowners attended pasture conditioning scoring training for CSP graziers. Technical assistance provided to two Hmong citizens regarding soils and program information.

VernonTwo meetings with the Ho Chunk Nation regarding completion of a EQIP contract. Two meetings with an Amish producer who hopes to participate in the EQIP program. Three conservation plans developed for another Amish producer who requested assistance.

Lumberjack RC&D.... Grazing Lands Conservation Initiative grant project outreach efforts included 2 educational assistance onsite visits to Mennonite farmers, 3 pasture walks and one grazing workshop with participation from 5 Mennonite farmers

Tribal Liaison Reports

Menominee Indian Tribe of Wisconsin and Stockbridge-Munsee Community

Sherrie Zenk-Reed, Tribal Liaison

Successfully worked with the Wisconsin Tribal Conservation Tribal Advisory Council (WTCAC), Jan Whitcomb and other NRCS staff to add two forestry related resource concerns to the list of EQIP resource concerns. By doing so there may be an increase in Tribal participation with respect to implementing forestry practices.

Worked the Agro forestry booth at Farm Technology Days, July 2006. Talked to numerous people about the benefits of agro forestry.

Held a Menominee County/Reservation Local Workgroup meeting to discuss USDA-NRCS program updates and changes, June 2006.

Participated in the 106 Consultation Tribal Summit held in Stevens Point, Aug 2006. The functions objective was to bring Tribal Historic Preservation Officers together and formulate a plan for review of Cultural Resources on all lands of interest to tribes.

Set up the NRCS career booth at the Clintonville Career Fair, April 2006. This annual event invites 8th graders from Shawano, Waupaca, and Menominee counties to explore career opportunities. This year's event was attended by approximately 1000 students.

Worked with the Menominee Tribal Historic Preservation Officer to complete cultural resources investigations on two EQIP project sites. An agreement was made to use a contractor that the Tribe preferred rather than NRCS's TSP archeologists. This agreed to action was critical. Without it the completion of future NRCS projects on the Menominee Indian Reservation may have not occurred.

Projects completed:

Stockbridge-Munsee Community completed 4 stream/water crossings on forestry roads. EQIP projects like these addressed water quality and fish habitat resource concerns. The completion of these projects will help reduce impacts to approximately 1500 acres of downstream fish habitat by reducing the risk of soil erosion from the logging roads.

Stockbridge-Munsee Community completed a wood duck nest box project (WHIP). 100 nest boxes were constructed and installed along the Red River riparian system.

Stockbridge-Munsee Community planted 5.2 acres of critical area planting along their forest roads (EQIP). This project was completed to reduce the potential for soil erosion.

Menominee Indian Tribe of Wisconsin completed their landfill restoration WHIP project. Approximately 8.2 acres of a reclaimed landfill site was seeded to native warm season grasses and forbs. The tribe hopes to use the site as a prairie demonstration site in the future as well as provide habitat for the endangered Karner Blue Butterfly.

Oneida Nation, Tony Bush, Tribal Liaison

April 1 – Sept. 30, 2006

Meetings:

<i>Group</i>	<i>No. of Meetings</i>	<i>Tribes Represented</i>
Oneida Sustainable Resources Advisory Council (OSRAC)	3	1
Oneida Environmental Resources Board (ERB)	2	1
Oneida Dept. of Land Management	2	1
Wisconsin Tribal Conservation Advisory Council (WTCAC)	<u>5</u>	11
Total	12	

Oneida Nation Contracts:

<u>Program</u>	<u>2006 Contracts</u>	<u>Total Active Contracts</u>
EQIP	3*	21*
WHIP	1	6
CSP	0	2*
CRP	<u>0</u>	<u>32</u>
Total	4	60

* includes 1 contract on tribal land to non-tribal lessee

Other Assistance:

- Participated in the Tribal Cultural Resources Workshop developed as a forum to assess and discuss the 106 process
- Served as Tribal EQIP coordinator and developed 2007 EQIP ranking tool for WTCAC targeted funding.
- Participated in periodic meetings with the Nation's farm, OSRAC and ERB to present program updates, discuss conservation needs on the Oneida Reservation, review new and revised conservation plans and coordinate departmental conservation activities.

■ Ho-Chunk Nation, Greg Yakle, District Conservationist

Area Office

A meeting date and agenda were developed for a November 2006 meeting with Ho-Chunk Nation Department of Natural Resource personnel and NRCS program managers. The meeting is set for Nov. 28, 2006 at the Ho-Chunk DNR Headquarters in Black River Falls. Topics will include EQIP and WHIP program updates and a review of the Cultural Resource policy of NRCS in Wisconsin as it relates to ground disturbing activities on tribal and non-tribal lands.

Richland County – Muscoda Effigy Mounds

The Army Corp of Engineers provided an estimate of \$40,000.00 for a construction survey and design of the site. This would lead to development of a proposal to protect the area from erosion along the banks of the Wisconsin River. The site has numerous burial mounds which are threatened by streambank erosion. Access for funding to pay for plan development continues to be a challenge. Possible alternatives being explored include using NRCS staff to complete the initial survey and contracting design assistance. Ultimately, funding will be looked for to provide bank stability.

Monroe County – Rockland Property

The Ho-Chunk nation successfully completed their 2001 EQIP contract for the Rockland farm by installing the last contract items in September 2006. A grass waterway and rock-surfaced access road were applied in some badly eroding areas. Total financial assistance paid on the contract was \$31,658.00. The contract included 10.3 acres of Grass Waterway, 350 ft of Access Road, 3 Grade Stabilization Structures, and 9 acres of Wetland Restoration. In addition, two unused wells were decommissioned on the property using special project funds authorized by NRCS in 2006.

Jackson County – Parmenter Property

The Ho-Chunk Nation completed this EQIP contract which included installation of grade stabilization structures, grassed waterways and access roads.

St. Croix, Tom Fredrickson, District Conservationist

- ✓ Attended WTCAC meetings at Red Cliff, Lac Du Flambeau and Stockbridge-Munsee Reservations.
- ✓ Attended Section 106 training in August at UW-Stevens Point.
- ✓ Worked with the St Croix on coordinating a nutrient management plan for their fish waste with an agronomist and local farmer.
- ✓ Gave technical assistance to the St. Croix on establishing a CRP food plot in Burnett County.

- ✓ Conducted a field visit inventory and evaluation of a parcel of tribal property in Burnett County to determine if area is eligible for the EQIP or WRP program.

Lac Courte Oreilles, Mike Koehler, District Conservationist

Work continued with the LCO on their four EQIP contracts and three WHIP contracts with many conservation practices being started this year. Discussions are currently taking place on plans for new applications for FY 07.

Lac du Flambeau, Julie Malvitz, District Conservationist

NRCS booth at the Lac du Flambeau annual Lakes Fest. NRCS liaison met with many tribal members and explained what NRCS does and the working relationship we have with the tribe. Distributed many Native American History Month posters, a very popular item.

NRCS liaison met with faculty and students at the Lac du Flambeau Public School (tribal), to talk about conservation efforts on tribal lands. The NRCS Native American History Month posters publicly displayed on the school walls.

Lac du Flambeau Program Activities

- Completed 250 acres of Forest Stand Improvement
- Completed 300 acres of prescribed burning
- Completed 6 acres of forest trails and landings

Sakaogon MOLE Lake Tribe, Julie Malvitz, District Conservationist

Implemented 13.5 acres of Wetland Restoration

Forest County Potawatomi, Julie Malvitz, District Conservationist

Implemented 5550 feet of access roads

Completed 4.0 acres of critical area planting

GOAL INDICATOR: 2.1 (c) Compliance Reviews/Corrective Actions:

Agencies conducted regular and systematic Civil Rights compliance reviews of Federally-assisted and conducted programs in accordance with Departmental Regulations and other guidance, including:

- (a) Analyzed trends in complaints to target compliance reviews;
- (b) Conducted appropriate compliance review(s) vis-à-vis the types of programs and activities conducted by the Agency (e.g., Federally assisted and/or conducted);
- (c) Identified basis(es) upon which compliance review(s) was/were conducted (e.g., race);
- (d) Identified issue(s) to be reviewed during the compliance review(s) (e.g., access to services,

- methods of administration);
- (e) Conducted appropriate number of compliance review(s) to ascertain that Federally-assisted and conducted programs/activities are delivered in compliance with regulatory and other requirements; and
 - (f) For Federally-assisted compliance reviews, Agency documented compliance with review guidance from Department of Justice (i.e., choosing recipients for reviews).

Agencies are required to provide to ASCR:

- (1) A copy of their original FY 2007 Compliance Review Plan/Schedule;
- (2) Identification of compliance reviews that were completed;
- (3) Stated reasons why any reviews were not conducted/completed; and
- (4) Status of all corrective actions identified, implemented, and completed for each compliance review.

Agencies must provide a succinct written rationale with evidence as to how the Agency determined its self-assessed point value.

N.B.: Effective FY 2008, agencies will be responsible for submitting a copy of their Compliance Review Plan/Schedule to ASCR compliance staff at the beginning of the FY or as soon as it is finalized.

SCORING: Total: 4 Points

4 Points: Agency complied with the 4 items listed below:

- (1) Compliance review plan was developed using the criteria set out above;
- (2) Number of compliance reviews that were completed;
- (3) Number and explanation as to why any compliance reviews were not conducted/completed; and
- (4) Status of corrective actions identified, implemented, and completed for each compliance review.

3 Points: Agency complied with 3 of the 4 items listed above in “4 Points.”

2 Points: Agency complied with 2 of the 4 items listed above in “4 Points.”

1 Point: Agency complied with 1 of the 4 items listed above in “4 Points.”

0 Points: Agency complied with 0 of the 4 items listed above in “4 Points.”

AGENCY RESPONSE:

Field Office and Area Office Reviews are conducted on a regular 4-5 year cycle. An improved Quality Review Management Guide has been adopted and is in use in Wisconsin.. The Civil Rights Committee is reviewing its portion of this again to facilitate training during the review process. Excerpts from the Quality Assurance Plan as of 6/22/2007 are below:

MILESTONE: Actions in the 2007 Quality Assurance Plan are implemented

Action	Start	End	Responsible Person	Percent Complete	Comments
Conduct Area Office Review in Juneau	6/2007	9/2007	Paczwa	100%	Scheduled for June 11-13. Completed
Utilize WI Position Management Plan to effectively address workload				100%	Meeting held for June 19
Conduct Activity Based Costing analysis	10/1/2006	12/15/2006	Paczwa, Thompson	100%	Completed 1/2007
<u>Annual 5% QAR:</u> a quality review of all Field Offices will be completed to assure that Farm Bill implementation is being completed according to policy.			STC (SRC) (ASTC-P) ASTC-FO (ARC)	50%	
<u>Formal Field Office Program Reviews Area 1 (NW):</u> Black River Falls, Medford, Menominee, Altoona,			STC ASTC-FO/Area Staff		Medford 2/07 Menominee 4/07
<u>Formal Field Office Reviews Area 2 (NE):</u> Waupaca (Waupaca Co.) 1/07, Luxemburg (Kewaunee Co) 2/07, Wausau (Marathon Co.) 3/07, Oconto (Oconto Co.) 5/07, Keshena (Menominee Co.) 7/07, WSCGA 8/07,			STC ASTC-FO/Area Staff		Waupaca 01/07 Oconto 3/07
<u>Formal Field Office Reviews Area 3 (SW):</u> Grant, Juneau & Lafayette			STC ASTC-FO/Area Staff		Lafayette completed. Juneau scheduled for 6/12-15
<u>Formal Field Office Reviews Area 4 (SE):</u> Washington, Fond du Lac, Dodge			STC (SRC) (ASTC-P) ASTC-FO		Washington/Ozaukee complete 2/07

Goal Indicator 2.1 (d) Compliance with Notification Requirements:

Complied with Civil Rights laws, regulations, and policies to ensure that all notification requirements were posted on appropriate documents and publications, including the Internet, and compliance with Section 508.

Notification requirements:

- (a) **Posted and published up-to-date nondiscrimination statements;**
- (b) Posted and published complaint filing information;
- (c) Posted and published information for individuals with disabilities as to how to obtain information in alternative format;
- (d) Posted and published information for individuals with limited English as to how to obtain information in alternative languages;
- (e) Policy, training, and information dissemination as to the provisions of auxiliary aids and services; and
- (f) Compliance with Section 508 while meeting these obligations.

These statements must be posted on all forms and publications, as well as other materials deemed necessary that are for or used by recipients, beneficiaries, and the public.

Agencies are required to provide evidence of compliance with the notification requirements, including information. Agencies must provide a succinct written rationale with evidence as to how the Agency determined its self-assessed point value.

SCORING: Total: 3 Points

3 Points: Demonstrated compliance with all 6 the above listed requirements.

2 Points: Demonstrated compliance with 4-5 of the above listed requirements.

1 Point: Demonstrated compliance with 2-3 of the above listed requirements.

0 Points: Demonstrated compliance with 0-1 of the above listed requirements.

AGENCY RESPONSE:

Field Office and Area Office Reviews are conducted on a regular cycle every 4-5 years. An improved Quality Review Management Guide has been adopted in Wisconsin.. The Civil Rights Committee is reviewing its portion of this again to facilitate training during the review process. The Civil Rights and Equal Opportunity review questions are below:

E. Civil Rights (CR) and Equal Opportunity (EEO) (CIVIL RIGHTS COORDINATOR)

1. Is Civil Rights training being conducted for employees?

2. Have special needs employees been accommodated?
3. Are required posters displayed prominently?
4. Does the office meet all accessibility requirements?
5. Do position descriptions have the Civil Rights statement included?
6. Are Area Staff making special efforts to recruit individuals from under-represented groups?
7. Is the file 230 "Equal Opportunity" being maintained? Where is the info kept on Program Discrimination complaints, Alternative Dispute, and how to file?

GOAL: 2. Program Delivery: Proactive Management and Legal Compliance:

Ensured all customers equal opportunity to access programs, activities, and services in the delivery of USDA programs and services.

PERFORMANCE OBJECTIVE: 2.2 Efficient Program Complaint Process:

Maintained an effective process for handling Civil Rights program complaints.

GOAL INDICATOR: 2.2 (a) Agency Position Statements Received Timely for Program Complaints:

Provided Agency Position Statements for program complaints of discrimination within 24 calendar days from receipt of request from ASCR. Agencies are required to provide the number of Agency position statements given to the ASCR and indicate what percentage was submitted timely. Agencies must provide a succinct written rationale with evidence as to how the Agency determined its self-assessed point value.

SCORING: Total: 3 Points

3 Points: Timely submitted 85-100 percent of all Agency position statements for program complaints of discrimination.

2 Points: Timely submitted 75-84 percent of all Agency position statements for program complaints of discrimination.

1 Point: Timely submitted 60-76 percent of all Agency position statements for program complaints of discrimination.

0 Points: Timely submitted 0-59 percent of all Agency position statements for program complaints of discrimination.

AGENCY RESPONSE:

There are no Civil Rights Program Complaints for Wisconsin NRCS as of this report.

Strong relationships are maintained and fostered with historically underserved populations in Wisconsin through advisory groups and designated collateral duties and dedicated positions such as Tribal Liaisons to ensure mutual understanding. Partnerships are developed and

sustain. A Civil Rights in Program Delivery power point presentation is available online and can be access by going to http://www.wi.nrcs.usda.gov/about/civil_rights.html .

GOAL INDICATOR: 2.2 (b) Complaint Non-Compliance/Corrective Actions:

Provided the number of program complaints investigated during the FY where corrective actions were identified, including conciliation agreements.

Provided a copy to ASCR of each corrective action plan/conciliation agreement.

Promptly implemented the terms of each corrective action plan/conciliation agreement; and

Responded timely to requests for non-compliance/corrective action-related information (e.g., data, analyses, reports, recommendations, and status reports) from ASCR. Agencies must provide succinct written rationale with evidence as to how the Agency determined its self-assessed point value.

SCORING: Total: 2 Points

2 Points: (a) 90-100 percent of corrective actions were implemented within 30 days of receipt of findings from ASCR; and
(b) 90-100 percent of Agency reports in response to allegations of non-compliance were submitted within 30 days from receipt of a request from ASCR.

1 Point: (a) 75 - 89 percent of corrective actions were implemented within 90 days of receipt of findings from ASCR; and
(b) 75- 89 percent of Agency reports in response to allegations of non-compliance were submitted within 45 days from receipt of a request from ASCR.

0 Points: (a) 74 percent or less of corrective actions were implemented within 120 days of receipt of findings from ASCR; and
(b) 74 percent or less of Agency reports in response to allegations of non-compliance were submitted within 60 days from receipt of request from ASCR; or
(c) No required corrective actions were implemented during FY 2007.

AGENCY RESPONSE:

There are no Civil Rights Program Complaints for Wisconsin NRCS as of this report. Notifications to clients are provided as standard business practice. Program brochures and policy statements are in multiple languages (Spanish, Hmong) and disabled farmers are accommodated. Civil Right Complaint process is now available on Wisconsin NRCS website.

GOAL: 3. EEO Program: Proactive Management and Legal Compliance:

Provided a workplace free of unlawful discrimination and enhanced the diversity of the workforce.

PERFORMANCE OBJECTIVE: 3.1 Model EEO Program:

Took affirmative steps to ensure that the Agency addressed EEO "Plan Objectives to Eliminate Barriers" and provide Civil Rights training to employees.

GOAL INDICATOR: 3.1 (a) Analysis of Workforce and Elimination of Barriers:

Used various tools, including, but not limited to, the EEO objectives of MD-715; the recruitment initiative of the Federal Equal Opportunity Recruitment Plan (FEORP), Disabled Veterans Affirmative Action Plan, and the hiring, promotion, and retention requirements for persons with targeted disabilities in Part J of MD-715. Specifically, the Agency:

- a) Took affirmative steps to ensure that the Agency addressed EEOC's "EEO Plan Objectives to Eliminate Barriers" through:
 - i) Increased representation; ii) Advancement opportunities; and iii) Retention of groups with low participation rates by race, sex, and national origin;
- b) Established and met hiring, advancement, and retention objectives for employees with targeted disabilities, as required by EEOC MD-715, Part J, "Special Program Plan for the Recruitment, Hiring, Advancement of Individuals with Targeted Disabilities;" and
- c) Promoted a workplace free of reprisal or harassment.

This process should be achieved through:

- (1) Assessment of workforce to determine low participation of groups by race, sex, national origin, and disability (RSNOD) to improve recruitment, advancement, and retention of those identified with low participation rates (i.e., below civilian labor force or Federal-high rate for persons with targeted disabilities);
- (2) Conducted barrier analyses to determine policy, practices, or procedures that may limit or tend to impede employment opportunities for members of a particular race, sex, national origin, or based on an individual's disability status;
- (3) Determination of objectives for targeted improvement to ensure equal employment for all groups;
- (4) Comparison of workforce statistics by race, sex, national origin, and targeted disability status in FY 2006 to FY 2007 to demonstrate measurable improvement in groups with low participation rates; and
- (5) Promoted a workplace free of reprisal or harassment.

Agencies are required to provide a summary analysis as to how they determined low participation rate of groups by RSNOD, identified planned objectives, and the status of the implementation of objectives to improve employment profiles for identified low participation groups. Agencies are required to provide a succinct written rationale with evidence as to how the Agency determined its self-assessed point value.

SCORING: Total: 3 Points

3 Points: Conducted workforce and barrier analyses and complied with all 5 elements listed above.

2 Points: Conducted workforce and barrier analyses and complied with 3-4 of the 5 elements listed above.

1 Point: Conducted workforce and barrier analyses and complied with 1-2 of the 5 elements listed above.

0 Points: Conducted workforce and barrier analyses and complied with 0 of the 5 elements listed above.

AGENCY RESPONSE:

Wisconsin NRCS's Retention/Recruitment Plan was implemented and new Student Recruitment Plan was formulated to simplify and advance the recruitment process and provide sufficient time for Management Team to make earlier decisions based on top student candidate recommendations from the CRC while promoting diversity. The Wisconsin Human Resource Manager coordinates recruitment including student intern recruitment with all of the above groups and local NRCS representatives of Universities, High Schools and underrepresented group organizations. Also PATCO statistics are reviewed on a regular basis and summarized in the Affirmative Employment Program Plan for the state.

Wisconsin implemented statewide Mentoring Program that has been proactive in providing support for new and existing NRCS employees who may see guidance in career goals and choices. Wisconsin Mentoring Coordinator have been in contact with several states in helping them implement a similar program in their state. There are 45 Mentors and 35 Mentees participating in the Mentoring Program. Area training was provide to the Mentors.

In addition, the most recent PATCO data from 9/30/06 is summarized from Affirmative Employment Program Plan of 2006. PATCO data is developed in National Headquarters and reviewed and maintained by Human Resources.

Noteworthy Accomplishments and initiatives for diverse workforce in excerpt from Affirmative Employment Program Plan:

1. Organizations and Resources

- A SEPM representative actively participated in MANRRS Chapter at UW-Madison in monthly meetings and planning of Region V MANRRS Workshop to be held on Nov.11, 2006.
- Updated the CR Website to include more CR issues and activities and to focus on Field Office CR needs.

2. Program Evaluations

- Civil Rights field office review processes are being streamlined and a template is being created for all offices to use.
- Outreach reports continue to promote and focus on state-wide achievements and progress.

GOAL INDICATOR: 3.1 (b) Civil Rights Training:

Conducted employee Civil Rights training to increase awareness, understanding, and appreciation for workforce diversity, and Civil Rights requirements. Agencies are required to provide a copy of their FY 2007 Civil Rights Training Plan and identify training that was completed in FY 2007, and state reasons why any required training was not completed. During FY 2007, agencies were to have completed, as soon as possible, any NoFEAR Act training that was not completed in calendar year 2006. Agencies must provide rationale as to how the Agency determined its self-assessed point value.

SCORING: Total: 2 Points

2 Points: Completed NoFEAR training within approved timeframes negotiated and approved by ASCR, and provided additional Civil Rights training.

1 Point: Completed NoFEAR training, but not within agreed upon timeframe, and/or did not provide additional Civil Rights training.

0 Points: Did not complete NoFEAR training, and/or did not provide additional Civil Rights training.

AGENCY RESPONSE:

Wisconsin has an active Civil Rights Committee that is committed to ensuring diversity, EEO opportunities and awareness. Regular Civil Rights/ EEO, and sexual harassments trainings have been provided to all offices and staffs. The Civil Rights Plan are in the State's Business Plan as well as in each Special Emphasis Program Managers' Business plan. The SEPMs has the opportunity to attend Civil Rights Training during their prospective SEPM Training. Additional CR online training is required for all employees and past training are taken by employees who did not finished them in 2006. In addition, the Recruitment/Retention Plan emphasis Civil Rights Training.

Excerpt from Recruitment/ Retention Plan:

Objective: Improve retention

<u>Action Items:</u> 1. Train all employees on why it is important to have a diverse workforce.	CR Comm Area Reps	
2. Managers and supervisors reinforce employee's value to Wisconsin. (Need for	Supervisor Mentor	Supervisor should work with employee on the employee development book. Should focus on growth of employee training need short and

one on one communication)		<i>long term.</i>
	<i>Mentoring Coord. Mentor</i>	<i>Employee encourages mentor program. Should work with that individual to increase the retention for the state.</i>
	<i>Training Coord. HR</i>	<i>Provide training for the supervisors on employee relations. Continue to provide the training for employees for statewide promotion potential.</i>
3. Create support system for all new hires within each office.	<i>SEPM</i>	<i>Work with the individuals to ensure all needs and reasonable accommodations are addressed.</i>

CR Complaint Training is being implemented throughout the four areas. Excerpt from 2007 Wisconsin Business Plan Plan:

OBJECTIVE: Ensuring Civil Rights (EEO and Program Delivery)

MILESTONE: Actions in the FY 2007 Civil Rights Plan are implemented

Action	Start	End	Responsible Person	Percent Complete	Comments
Complete CR Complaint Training to all employees	1/1/2007	9/30/2007	CR Committee		SW Area Employee Training complete 3/29/07

PERFORMANCE OBJECTIVE: 3.2 Comprehensive EEO Evaluation Program:

Assessed employment policies and practices.

GOAL INDICATOR: 3.2 (a) Compliance Reviews/Corrective Actions:

Agencies conducted regular and systematic Civil Rights compliance reviews in accordance with Departmental Regulations and other guidance.

Agencies are required to provide to ASCR:

- (1) A copy of their original FY 2007 Compliance Review Plan/Schedule;
- (2) Number of compliance reviews that were completed;
- (3) Number and explanation as to why any compliance reviews were not conducted/completed; and
- (4) Status of all corrective actions identified, implemented, and completed for each compliance review.

Agencies must provide a succinct written rationale with evidence as to how the Agency determined its self-assessed point value.

N.B.: Effective FY 2008, Agencies will be responsible for submitting a copy of their compliance review plan/schedule to ASCR compliance staff at the beginning of the FY or as soon as it is finalized.

SCORING: Total: 4 Points

4 Points: Agencies provided documentation substantiating the following:

- (1) Compliance review plan was developed;
- (2) Number of compliance reviews that were completed;
- (3) Number and explanation as to why compliance reviews were not conducted/completed; and
- (4) Status of all corrective actions identified, implemented, and completed for each compliance review.

3 Points: Agency complied with 3 of the 4 items listed above in “4 Points.”

2 Points: Agency complied with 2 of the 4 items listed above in “4 Points.”

1 Point: Agency complied with 1 of the 4 items listed above in “4 Points.”

0 Points: Agency complied with 0 of the 4 items listed above in “4 Points.”

AGENCY RESPONSE:

Field Office and Area Office Reviews are conducted on a regular cycle every 4-5 years. An improved Quality Review Management Guide has been adopted and is in use in Wisconsin at the field and area office levels. The Civil Rights Committee is reviewing its portion of this again to facilitate training during the review process. Civil Rights information and guidelines are available on the Wisconsin NRCS website.

Excerpt from NW Area CR Review at Kewaune/Luxemburg office.

Corrective actions that need to be taken:

1. The poster area needs to be established and posters put up. Several posters are missing and need to be ordered.
2. At a staff meeting go over the EEO and Civil Rights complaint process and how to file a complaint. Go over the Employee Assistance Program (EAP).
3. Develop a Civil Rights (230) folder for the NRCS Luxemburg Service Center and keep it up to date.

GOAL INDICATOR: 3.2 (b) NoFEAR Act:

Provided timely Agency submissions to be used in the Department’s Annual Report, and other items as requested by ASCR. Agencies must provide a succinct written rationale along with documentation as to how the Agency determined its self-assessed point value.

SCORING: Total: 1 Point

1 Point: Responded timely to ASCR for requested information.

0 Points: Did not respond in a timely manner or did not provide requested information requested by ASCR.

AGENCY RESPONSE:

No Civil Rights requests for NO FEAR Act compliance. All necessary training and office documentation provided and reviewed in regular quality management reviews. In 2007, 11 employees completed the No FEAR Act online training adding to the total of 272 employees. Training Coordinator continues to make sure that all employees receive the online training.

PERFORMANCE OBJECTIVE: 3.3 Efficient EEO Complaint Process: Managed an effective complaint processing program.

GOAL INDICATOR: 3.3 (a) Timely Submitted EEO Counselors' Reports:

Submitted timely EEO counselors' reports within 15 calendar days from the issuance to the complainant of the Notice of Right to File. Agencies are required to provide the number and percentage of EEO Counselors' reports completed in a timely manner. Agencies must provide a succinct written rationale with evidence as to how the Agency determined its self-assessed point value.

SCORING: Total: 4 Points

4 Points: Submitted 90-100 percent of the EEO Counselors reports within 15 calendar days.

3 Points: Submitted 80-89 percent of the EEO Counselors reports within 15 calendar days.

2 Points: Submitted 70-79 percent of the EEO Counselors reports within 15 calendar days.

1 Point: Submitted 60-69 percent of the EEO Counselors reports within 15 calendar days.

0 Points: Submitted 0-59 percent of the EEO Counselors reports within 15 calendar days.

AGENCY RESPONSE:

Wisconsin Civil Rights Committee have emphasized on updating the State's Civil Right Page online. Civil Right and EEO Counseling and Mediation steps and procedures are posted online and available for use as training materials. Posters are reviewed and subjected to being posted at offices.

GOAL INDICATOR: 3.3 (b) Completed EEO Investigations Within 90-Days:

Completed investigations and distributed Reports of Investigation (ROI) within the 90-Calendar day timeframe (beginning the date ASCR notified the Agency of the complaint). Agencies are

required to provide the number of investigations and the percentage completed in a timely manner.

Agencies must provide a succinct written rationale as to how the Agency determined its self-assessed value.

SCORING: Total: 4 Points

4 Points: Completed 85-100 percent of investigations (including distribution of ROI) within 90-calendar days.

3 Points: Completed 75-84 percent of investigations (including distribution of ROI) within 90-calendar days.

2 Points: Completed 65-74 percent of investigations (including distribution of ROI) within 90-calendar days.

1 Point: Completed 55-64 percent of investigations (including distribution of ROI) within 90 calendar days.

0 Points: Completed 0-54 percent of investigations (including distribution of ROI) within 90 calendar days.

AGENCY RESPONSE:

No EEO investigations this Fiscal Year.

GOAL INDICATOR: 3.3 (c) Efficient Use of alternative dispute resolution (ADR) for EEO and Disputes:

- Demonstrated good faith efforts to resolve EEO complaints and workplace disputes, especially early in the process or before an EEO complaint was initiated.
 - (a) Assured good faith resolution attempts were a high priority for all;
 - (b) Provided opportunity to resolve workplace conflicts at any stage; and
 - (c) Assured compliance with the provisions of the ADR regulation, including offers of ADR to all informal complainants, and documentation of non-offers of ADR at the formal complaint stage.
- Assured participation in Department-wide ADR initiatives aimed at training ADR practitioners, ADR awareness, and other efforts to increase conflict management competence at USDA.
 - (a) Educated, trained, and informed employees of conflict management practices and the availability of ADR assistance;
 - (b) Assured that managers received training to constructively address workplace conflict and discrimination complaints; and
 - (c) Assured a core group of managers and supervisors were trained and available to serve as Resolving Officials for discrimination complaint mediations.

- Provided thorough and timely reports of ADR activities to the ASCR Conflict Prevention and Resolution Center (CPRC).

Agencies are required, as a minimum, to provide the number of (a) informal and (b) formal cases. Also, agencies must provide succinct written rationale with evidence as to how the Agency determined its self-assessed point value.

SCORING: Total: 3 Points

3 Points:

- (1) Increased the use of ADR in the informal stage and decreased the number of complaints in the formal stage;
- (2) Participated in Department-wide ADR initiatives and provided ADR education and awareness; and
- (3) Provided timely and accurate reports to CPRC.

2 Points: Complied with 2 of the 3 requirements listed in above in “3 Points.”

1 Point: Complied with 1 of the 3 requirements listed in above in “3 Points.”

0 Points: Complied with 0 of the 3 requirements listed in above in “3 Points.”

AGENCY RESPONSE:

No EEO investigations this Fiscal Year. Wisconsin Civil Rights Committee have emphasized on updating the State’s Civil Right Page online. Civil Right and EEO Counseling and Mediation steps and procedures are posted online and available for use as training materials.

GOAL INDICATOR: 3.3 (d) Complaint Non-Compliance/Corrective Actions:

- Provided the average number of days to respond to requests for information from EEO counselors, investigators, and adjudicators by type of request.
- Provided the average number of days to fully implement the terms of settlement agreements, including terms of the Basu settlement agreement, where applicable.
- Provided the number of requests for non-compliance/corrective action-related information (e.g., data, analyses, reports, recommendations, and status reports) from ASCR, and the average number of days to respond to each type of request.

Agencies must provide succinct written rationale and evidence as to how the Agency determined its self-assessed point value.

N.B.: Effective FY 2008, the data requested in this indicator relative to EEO will also be required for program Civil Rights compliance.

SCORING: Total 3 Points

3 Points:

- a) Agency responded timely 90-100 percent of the time to requests for information from EEO counselors, investigators, adjudicators, and ASCR compliance staff;
- b) Agency implemented and completed 90-100 percent of all corrective actions within negotiated timeframes; and
- c) Agency responded timely 90-100 percent of the time to all requests from ASCR.

2 Points:

- a) Agency responded timely 75-89 percent of the time to requests for information from EEO counselors, investigators adjudicators, and ASCR compliance staff;
- b) Agency implemented and completed 75-89 percent of all corrective actions within negotiated timeframes; and
- c) Agency responded timely 75-89 percent of the time to all requests from ASCR.

1 Point:

- a) Agency responded timely 60-74 percent of the time to requests for information from EEO counselors, investigators, adjudicators, and ASCR compliance staff,
- b) Agency implemented and completed 60-74 percent of all corrective actions within negotiated timeframes; and
- c) Agency responded timely 60-74 percent of the time to all requests from ASCR.

0 Points:

- a) Agency responded timely 59 percent or less of the time to requests for information from EEO counselors, investigators, adjudicators, and ASCR compliance staff,
- b) Agency implemented and completed 59 percent or less of all corrective actions within negotiated timeframes; and
- c) Agency responded timely to 59 percent or less of the time to all requests from ASCR.

AGENCY RESPONSE:

Employee complaint process in place and is reviewed at all levels. This is part of the Quality Review Management Guide as discussed under goal indicator 2.1 (c). Civil Rights Committee Representative makes regular presentations at informational meetings in the areas. Presentations include supervisor's and employees knowing the bases for which civil rights discrimination complaints can be filed, know how to accept and process a civil rights discrimination complaint, have a copy of instructions on file, making sure employees are aware

of the procedures in the instructions, understanding the EEO counseling and compliant process, and making sure employees are aware of how to contact an EEO Counselor. Special Emphasis Program Managers assist in making employees aware of these efforts as well. Alternative Dispute Resolution procedures are in place and are effectively being used. No complaints create limited data to track and analyze trends. There are no Civil Rights Program Complaints for Wisconsin NRCS as of this report.

GOAL: 4. Procurement:

Ensured equal opportunity for minorities, women-owned, small and disadvantaged businesses; service-disabled veterans, American Indians/Alaska Natives, and persons with disabilities (AbilityOne, also known as the Javits-Wagner-O'Day Act or "JWOD") in all USDA contracting activities.

PERFORMANCE OBJECTIVE: 4.1 Procurement Goals:

Took affirmative steps to increase procurement with businesses owned and operated by women, minorities, service disabled veterans, small and disadvantaged businesses, American Indians/Alaska Natives, and persons with disabilities (AbilityOne (JWOD) non-profit service providers).

GOAL INDICATOR: 4.1 (a) Accomplishment of Goals:

Developed and implemented effective strategies for improving participation by women, minorities, service-disabled veterans, small and disadvantaged businesses, American Indians/Alaska Natives, persons with disabilities (AbilityOne (JWOD) service providers) and for accomplishing all goals.

Agencies are required to provide procurement goal targets for each major category and the associated percentage achieved for each goal. Agencies must provide succinct written rationale and evidence as to how the Agency determined its self-assessed point value.

SCORING: Total: 2 Points

2 Points: Developed and implemented effective strategies and accomplished 90-100 percent of procurement goals.

- 1 Point:** a) Developed and implemented effective strategies and accomplished 50-89 percent of procurement goals; and
b) Reviewed existing procurement agreements and identified and implemented additional strategies necessary to increase contracting to enumerated groups.

- 0 Points:** a) Developed and implemented effective strategies, but accomplished less than 49 percent of procurement goals; and
b) No review of existing agreements or strategies identified, developed, or implemented to increase contracting to enumerated groups.

AGENCY RESPONSE:

Wisconsin NRCS continues to use OfficeMax in the vast majority of procurement purchases as stated in last year's report.. This mandatory BPA covers services to minority, women-owned, small and disadvantaged businesses and person with disabilities under the Javits-Wagner-O'Day Act.

The table below is a report from Wisconsin procurement of items over \$25,000 that will be a part of the Federal Procurement Data System – Next Generation (FPDS-NG) in 2006 that tracks vendor categories as described above.

Acquisition Date	Reference No.	Vendor Name	Amount	Vendor PP Category
06/15/06	VISA WI-06-0016	TEKMON, LLC	\$30,876.91	Large
06/21/06	AG-5F48-C-0G0012	WONDRA EXCAVATING	\$315,790.00	Small

Regarding SDVO businesses, we had a goal of awarding 3% of our contracting dollars to SDVO businesses, and current have a solicitation valued at between \$60-75k set-aside for an SDVO.

The table below is a report from Wisconsin procurement of items for the 2007 Contract Award to Small Businesses:

Date	Name	Number	Est	Actual	
12/18/07	Aurora Farms Wetland Restoration	AG-5F48-S-07-0001		\$136,000.00	Reed C. Meltz and Sons
12/21/06	Prescribed Burning (WRP)	AG-5F48-S-07-0002		\$23,480.00	Quercus Land Stewardship
04/09/07	Wetland Determinations (Dodge Cty)	AG-5F48-S-07-0003		\$11,888.40	Soil Investigations, Inc
04/09/07	Wetland Determinations (Jefferson Cty)	AG-5F48-S-07-0004		\$19,007.81	Emmons and Oliver Resources
05/17/07	Columbia County WRPs (Devries, Hoffman, Kreuger, Patterson/Bruenig, Weisensel)	AG-5F48-S-07-0006	\$60-75k	Closes 7/2/2007	SDVA Set-Aside